

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NATIONAL UNION FIRE INSURANCE §
COMPANY OF PITTSBURGH, PA §
Plaintiff, §

V. §

BACARELLA TRANSPORTATION §
SERVICES, INC. D/B/A BTX GLOBAL §
LOGISTICS, SPRINT CORPORATION, §
BRIGHTSTAR INTERNATIONAL CORP. §
D/B/A BRIGHTSTAR CORP., T.S. §
EXPRESS, INC., FORWARD AIR §
CORPORATION, NORMARK OF TEXAS, §
LLC, AND OSCAR MACEDO §
CAMPUZANO §
Defendants §

C.A. No. 3:19-CV-01364-X

MOTION FOR VOLUNTARY DISMISSAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff, National Union Fire Insurance Company of Pittsburgh, PA, and files its Motion for Voluntary Dismissal of Sprint Corporation and Sprint/United Management Company without prejudice. Plaintiff, National Union Fire Insurance Company of Pittsburgh, PA does not desire to try this matter against Defendants Sprint Corporation and/or Sprint/United Management Company. Defendants have not answered or filed a motion for summary judgment in this case. Plaintiff requests this Honorable Court enter an Order of Dismissal as to Sprint Corporation and Sprint/United Management Company only.

Respectfully submitted this 30th day of November 2020.

Respectfully submitted,

DOWNS♦STANFORD, P.C.

//s// Timothy U. Stanford *

Timothy U. Stanford
State Bar No. 19041030
Fed. I.D. No. 14285
2001 Bryan Street, Suite 4000
Dallas, Texas 75201
Phone: (214) 748-7900
Fax: (214) 748-4530
Email: tstanford@downsstanford.com
*Attorney for Plaintiff, National Union Fire
Insurance Company of Pittsburgh, PA*

**Electronic signature by permission.*

THE BALE LAW FIRM, PLLC

//s// Jeffrey R. Bale

Jeffrey R. Bale
State Bar No. 01629800
Federal ID No. 3324
Kensington I, Suite 200
1600 Highway 6 South
Sugar Land, Texas 77478
Phone: (281) 295-6000
Fax: (281) 295-6010
Email: jbale@balelawfirm.com
*Attorney for Plaintiff,
National Union Fire Insurance Company
of Pittsburgh, PA*

OF COUNSEL

Ross B. Bale
State Bar No. 24094522
Federal ID No. 2639704
THE BALE LAW FIRM, PLLC
Kensington I, Suite 200
1600 Highway 6 South
Sugar Land, Texas 77478
Phone: (281) 295-6000
Fax: (281) 295-6010
Email: rbale@balelawfirm.com
*Attorney for Plaintiff,
National Union Fire Insurance
Company of Pittsburgh, PA*

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am a member of THE BALE LAW FIRM, PLLC, attorneys for the Plaintiff herein, and that I have provided a copy of the foregoing to all counsel of record via the ECF Filing System and/or via electronic transmission this **30th** day of **November, 2020**.

Via the ECF Filing System

Mr. James R. Koecher
Mr. Michael D. Williams
Brown Sims, P.C.
1177 West Loop South, 10th Floor
Houston, Texas 77027
*Counsel for Defendant,
Bacarella Transportation Services, Inc.
d/b/a BTX Global Logistics*

Via the ECF Filing System

Mr. Vic Houston Henry
Ms. Emileigh Stewart Hubbard
Henry Oddo Austin & Fletcher, P.C.
1700 Pacific Avenue, Suite 2700
Dallas, Texas 75201
*Counsel for Defendant,
Forward Air Corporation*

Via the ECF Filing System

Mr. Brooks H. Spears
MCGUIREWOODS LLP
1750 Tysons Blvd., Suite 1800
Tysons, Virginia 22102-4215
*Counsel for Defendants,
Sprint/United Management Company
and Sprint Corporation*

Via Email: jgreene@scopelitis.com

Mr. John W. Greene
Scopelitis, Garvin, Light, Hanson
& Feary, P.C.
777 Main Street, Suite 3450
Fort Worth, Texas 76102
*Local Counsel for Defendant,
Normark of Texas, LLC*

Via the ECF Filing System

Mr. Antonio C. "Chris" Rodriguez
Hermes Law, P.C.
2001 N. Lamar St., Suite 450
Dallas, Texas 75202
*Local Counsel for Defendant,
Bacarella Transportation Services, Inc.
d/b/a BTX Global Logistics*

Via the ECF Filing System

Ms. Lishel M. Bautista
MCGUIREWOODS LLP
2000 McKinney Avenue, Suite 1400
Dallas, Texas 75201
*Local Counsel for Defendants,
Sprint/United Management Company
and Sprint Corporation*

Via the ECF Filing System

Mr. Randy D. Gordon
Mr. Lucas C. "Luke" Wohlford
Barnes & Thornburg, LLP
2121 North Pearl Street, Suite 700
Dallas, Texas 75201-2469
*Counsel for Defendant,
Brightstar International Corp.*

Via Email: kjeffries@scopelitis.com

Ms. Kathleen C. Jeffries
Scopelitis, Garvin, Light, Hanson
& Feary, P.C.
2 North Lake Avenue, Suite 560
Pasadena, California 91101
*Counsel for Defendant,
Normark of Texas, LLC*

//s// Jeffrey R. Bale

Jeffrey R. Bale